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Governor



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WA 2813
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Director

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

4350-150th Ave. N.E. • Redmond, Washington 98052 • (206) 885-1900

May 6, 1985

RECEIVED

MAY 10 1985

Mr. John LaVillette, Plant Industrial Engineer
Earle M. Jorgensen Company
Steel Forge Division
P.O. Box 24026
Seattle, Washington 98124

WASTE MANAGEMENT BRANCH

Designation of Baghouse (Flue Dust) Pellets
Generated at the Earle M. Jorgensen Co.
Facility (WAD000602813) in Seattle, Washington

Dear Mr. LaVillette:

This letter is in response to your letter dated March 22, 1985, and our telephone conversation on May 2, 1985, regarding the proper designation of the baghouse flue dust pellets generated by your facility. I regret the delay in my response to that letter and any inconvenience that it may have caused you or your facility.

You are correct in your position that, based on the EP Toxicity test results presented with your letter, the flue dust does not qualify as an EP Toxic dangerous waste, specifically D007 or D008. The flue dust may qualify, however, as the EPA and State listed waste K061, "Emission control dust/sludge from the primary production of steel in electric furnaces". I have enclosed, for your information, a copy of the most recent EPA guidance that I am aware of regarding the K061 waste category. I suggest that you contact Mr. Mike Bussell of the EPA Region 10 office in Seattle (at (206) 442-2859) and/or Mr. Ross Potter of the WDOE headquarters office in Olympia (at (206) 459-6303) for further updated information regarding the definition of K061 waste.

If the K061 waste category does pertain to your facility's flue dust, the dust must be handled and manifested as K061 waste until you have successfully delisted the dust from that category. Section 910 of WAC 173-303 describes the delisting process required by the state. I have also enclosed a copy of that section for your information and records. All such delisting petitions should be sent to Mr. Potter in Olympia.

USEPA RCRA

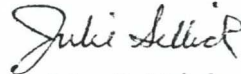


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Mr. John LaVillette, Plant Industrial Engineer
May 6, 1985
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Don't hesitate to contact this office if you have questions regarding this letter. Thank you for your cooperation in this matter.

Sincerely,



Julie Sellick
Hazardous Waste Inspector/Specialist
Environmental Quality

JAS:ph

Enclosures (2)

cc: Tom Cook, WDOE Headquarters
Ross Potter, WDOE Headquarters
Mike Bussell, U.S. EPA Region 10

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

RECEIVED
AUG 29 1984

DATE: July 11, 1983

SUBJECT: Scope of the Listing K061, Emission Control Dust/Sludge from the Primary Production of Steel in Electric Furnaces

FROM: Alan Corson, Chief *Alan Corson*
Waste Characterization Branch (WH-565-B)TO: Chief, Residuals Management Branch
Air & Waste Management Division

This is in response to your question as to the scope of the listing K061 Emission control dust/sludge from the primary production of steel.

Interpretation of Scope of K061

The K061 waste listing is defined under 40 CFR Section 261.32 as "Emission control dust/sludge from the primary production of steel (T)."

- This applies to steel produced in electric furnaces, not blast furnaces.
- The listing does not include foundries.
- Facilities that use scrap steel as a raw material are included in the listing.
- The listing does not include iron making.

If a facility produces steel in an electric arc furnace using steel scrap, the emission control dust meets the listing of K061. What is done with the steel after this process does not affect the process wastes' inclusion in the listing.